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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

COTY RICHARDSON,

Plaintiff,

vs.

NORTHWEST CHRISTIAN  
UNIVERSITY, an Oregon Corporation,

Defendant.

Case No. 6:15-cv-01886-AA

**STIPULATED MOTION TO  
DISMISS VARIOUS CLAIMS**

STIPULATED MOTION TO DISMISS VARIOUS CLAIMS

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(6:15-cv-01886-AA)

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**CERTIFICATE PURSUANT TO LR 7.1**

Pursuant to Local Rule 7.1, counsel for the parties have conferred by email regarding the subject of this motion. After conference between counsel, including review of a draft of this motion, the parties agree that the requested motion is reasonable and appropriate under the circumstances.

**MOTION**

The parties hereby move to dismiss the following five claims, with prejudice, and without an award of costs to either party, alleged in Plaintiff Coty Richardson's Second Amended Complaint:

- Fourth Claim for Relief (religious discrimination under state law);
- Fifth Claim for Relief (wrongful termination in violation of public policy);
- Eighth Claim for Relief (violation of the Oregon wage statutes);
- Ninth Claim of Relief (violation of specific treatment in specific situations);
- Twelfth Claim of Relief (religious discrimination under federal law).

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DATED: November 17, 2016.

**HKM EMPLOYMENT ATTORNEYS LLP    MERSEREAU SHANNON LLP**

*s/Dan Kalish*

Daniel Kalish, OSB No. 111529

*Attorneys for Plaintiff Coty Richardson*

*s/Karen Vickers*

Karen M. Vickers, OSB No. 913810

*Attorneys for Defendant Northwest Christian  
University*

STIPULATED MOTION TO DISMISS VARIOUS CLAIMS

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing **JOINT STIPULATED MOTION TO DISMISS VARIOUS CLAIMS** with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to the following:

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*Attorneys for Defendant Northwest Christian University*

**DATED:** November 17, 2016

**HKM EMPLOYMENT ATTORNEYS LLP**

By: s/Lara Flores  
Lara Flores